



CHIESA SHAHINIAN & GIANTOMASI PC

11 Times Square, 34th Floor, New York, NY 10036
csglaw.com

A. ROSS PEARLSON

Member

rpearlson@csglaw.com

O 973.530.2100 F 973.325.1501

BY ECF

September 29, 2023

The conference scheduled for **October 3, 2023**, is canceled. The parties shall submit their responses to the pre-motion letters by **October 5, 2023**.

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Dated: **October 2, 2023**
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

**Re: *Cypress Holdings, III, L.P. v. Hall, et al.*, Docket No. 22-cv-01243 (LGS)
Sport-BLX, Inc. v. Salerno, et al., Docket No. 22-cv-08111 (LGS)**

Dear Judge Schofield,

This firm represents Plaintiff Cypress Holdings, III, L.P. (“Cypress”) in the action entitled *Cypress Holdings, III, L.P. v. Hall, et al.*, Docket No. 22-cv-01243 (LGS) (the “Cypress Action”). This firm also represents Defendants Michael M. Salerno (“Mr. Salerno”) and Cypress (collectively, the “Cypress Parties”) in the related action entitled *Sport-BLX, Inc. v. Salerno, et al.*, Docket No. 22-cv-08111 (LGS) (the “Sport-BLX Action”) (collectively, with the Cypress Action, the “Actions”).

We write in further response to the Cypress Parties’ pre-motion letter filed on September 15, 2023. Since that date, and pursuant to Your Honor’s Order dated September 20, 2023, the parties have met and conferred and have resolved the issues raised in the September 15, 2023 pre-motion letter. Accordingly, there will be no need for the Court’s intervention with respect to the issues raised, and the conference presently scheduled for October 3rd, 2023, can be cancelled.

On behalf of, and with the consent of all parties, we also request that the Court allow the parties an additional day, or until October 5, 2023, to file their responses to the pre-motion letters.

We thank the Court in advance for its consideration.

Respectfully submitted,

/s/ A. Ross Pearlson

A. Ross Pearlson
Member